



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
RESEARCH TRIANGLE PARK, NC 27711

DEC 03 2009

OFFICE OF  
AIR QUALITY PLANNING  
AND STANDARDS

Mr. Pradeep Raval  
Koogler and Associates, Incorporated  
4014 NW 13<sup>th</sup> Street  
Gainesville, Florida 32609-1923

Dear Mr. Raval:

In your November 9, 2009 letter, you asked to use Method 6C in place of Method 8 to certify a sulfur dioxide (SO<sub>2</sub>) continuous emission monitoring system (CEMS) at the White Springs Agricultural Chemicals facility in Hamilton County, Florida. The facility's sulfuric acid plant is subject to 40 CFR 60 Subpart H, Standards of Performance for Sulfuric acid plants. Section 60.84(a) of Subpart H requires the CEMS be certified against Method 8, however, the method only has to measure SO<sub>2</sub>.

It is acceptable to use Method 6C in place of Method 8 to certify an SO<sub>2</sub> CEMS under Subpart H. We, therefore, grant you permission to use Method 6C at the previously mentioned facility since the sulfur trioxide and sulfuric acid measuring capabilities of Method 8 are not needed. Since this alternative method is applicable to other similar facilities in this source category, we will be posting this letter on our website at <http://www.epa.gov/ttn/emc/approalt.html> for use by other interested parties.

If you have questions or would like to discuss the matter further, please call Foston Curtis at (919) 541-1063 or you may e-mail him at [curtis.foston@epa.gov](mailto:curtis.foston@epa.gov).

Sincerely,

A handwritten signature in blue ink that reads "Candace B. Sewell for CBO".

Conniesue B. Oldham, Ph.D., Group Leader  
Measurements Technology Group

cc: Richard Banks, FDEP NE District  
Foston Curtis (E143-02)  
Rita Felton-Smith, FDEP NE District  
David McNeal, Region IV